

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

CHRISTA KATSENES

Plaintiff,

V.

Civil Action No.: 1:19-cv-12112-DJC

**U.S. BANK TRUST, N.A., AS
TRUSTEE FOR LSF9 MASTER
PARTICIPATION TRUST**

Defendant.

**MOTION TO QUASH DEPOSITION SUBPOENAS AND/OR ISSUE A
PROTECTIVE ORDER**

Pursuant to Federal Rules of Civil Procedure 26(c) and 45(d)(3), Defendant/Counterclaim Plaintiff U.S. Bank Trust, N.A., as Trustee for LSF9 Master Participation Trust (“U.S. Bank”) hereby submits its Motion to Quash Subpoenas and/or Issue a Protective Order prohibiting the Plaintiff from enforcing four (4) Notices of Taking Depositions and deposition subpoenas served by Plaintiff/ Counterclaim Defendant Christa Katsenes (“Plaintiff”) on (1) U.S. Bank’s counsel of record, Reneau Longoria (2) WFG National Title Insurance Company, Inc. and (3) Vylla Title, LLC, f/k/a Carrington Title Services, LLC and (4) LSF9 Mortgage Holdings LLC. The Deposition Subpoenas exceed the scope of discovery, elicit privileged testimony, and have noticed topics which are wholly irrelevant to the instant litigation. In further support of this Motion, U.S. Bank relies upon its Memorandum of Law in Support of Motion to Quash Deposition Subpoenas and/or Issue a Protective Order, filed herewith.

WHEREFORE, Defendant U.S. Bank requests that this Court quash the Deposition Subpoenas in their entirety and/or issue a protective order, as outlined in the accompanying Memorandum of Law filed herewith.

Respectfully submitted,

**U.S. BANK TRUST, N.A. AS TRUSTEE
FOR LSF9 MASTER PARTICIPATION
TRUST,**

DEFENDANT/COUNTERCLAIM PLAINTIFF,

By its attorneys,

/s/ Julianna M. Charpentier
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Dated: January 21, 2022

LOCAL RULE 7.1(A)(2) CERTIFICATE

I, Julianna Charpentier, Counsel for U.S. Bank Trust, N.A. as Trustee for LSF9 Master Participation Trust, hereby certify pursuant to Local Rule 7.1(A)(2) that on January 21, 2022 I have conferred with counsel for Christa Katsenes by phone regarding the matters set forth herein. The parties were unable to reach an agreement as to the issues contained herein.

/s/Julianna M. Charpentier
Julianna M. Charpentier

CERTIFICATE OF SERVICE

I, Julianna M. Charpentier, certify that this document filed through the ECF system will be sent to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on January 21, 2022.

/s/Julianna M. Charpentier
Julianna M. Charpentier